



## DISABILITY AND COMMUNICATION ACCESS BOARD

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### INTERPRETIVE OPINION

Pursuant to §103-50, Hawaii Revised Statutes (HRS), all buildings and facilities constructed by, or on behalf of the State or any county, shall conform to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and amendments. In accordance to HRS §103-50 and Chapter 11-217, Hawaii Administrative Rules, the Disability and Communication Access Board has authority to issue interpretive opinions to HRS §103-50 design standards.

**Docket:** **DCAB 2001-09:** Interpretive Opinion on ADAAG 4.1.6(1) Accessible Buildings: Alterations - General. Would thresholds at doorways be required to be made accessible when alterations such as replacement of flooring and/or replacing doors and door hardware occurs?

**Summary:** The Guidelines are limited to addressing only the *scope of work*, and outside of that the Department of Justice (DOJ) addresses *path of travel*, *programmatically access*, or *barrier removal*. *Barrier removal* does not apply to Title II projects and *scope of work* does not trigger the requirement for threshold accessibility. *Path of travel* requirements kick in if alterations are made to a *primary function area* and according to the DOJ if, for example, the flooring is being changed, then the door and threshold would need to be made accessible since they are part of the *path of travel*.

Consideration must be made to other factors, such as if the altered door is at a primary entrance, or if a classroom's flooring is replaced and not all doors are altered. Furthermore, if the *accessible route* is considered to be *only up to the entrance of a primary function area*, and does not therefore require access at the change in elevation (threshold). If the door width is changed and a new door is provided, then an accessible threshold would be required, and not required if there is repair to termite damage, for example, and only the door is being replaced. If the majority of items are being touched then an accessible threshold would be required, such as a change is made to the door, the hardware, or the closer

**Ruling:** For buildings or facilities subject to HRS § 103-50,

#### **ADAAG 4.1.6(1) Accessible Buildings: Alterations - General**

The path of travel requirement shall include accessibility to the threshold as part of the door opening into the primary function area being altered.

[Rul: 08/01] (Auth and Imp: HRS §103-50)

If you have any questions or comments regarding this ruling, please call us at 586-8121.

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